PURPOSE:
To provide guidelines for using or disclosing protected health information ("PHI") for fundraising in compliance with federal and state privacy laws.

POLICY:
1. It is the policy of Health Quest Systems, Inc. and affiliates ("HQ") that, unless an individual’s authorization is obtained, to release only limited PHI for fundraising purposes, including the patient contact information, such as name, address and phone number, the dates of treatment or services, the department that treated the patient, the patient’s treating physician, and the patient’s medical outcomes.

2. HQ will include in any fundraising materials it sends to individuals a description of how to opt out of receiving further fundraising communications.

3. HQ will not condition patient treatment or payment on whether the individual has opted out of receiving fundraising communications.

4. The HQ Notice of Privacy Practices includes information informing individuals that they may opt out of fundraising activities and communications.

DEFINITIONS: See HIPAA Glossary

ENFORCEMENT:
All individuals whose responsibilities are affected by this policy are expected to be familiar with the basic procedures and responsibilities created by this policy. Failure to comply with this policy will be subject to appropriate remedial and/or disciplinary action, up to and including termination of any employment or other relationship, in accordance with this policy.

Failure to comply with this policy and related procedures will result in appropriate remedial and/or disciplinary actions, up to and including termination of any employment or other relationship.

REFERENCES:
45 CFR, Parts 160 and 164
45 CFR 164.514(f)
45 CFR 164.520(b)(1)(iii)(A)
5.2.24 Fundraising and the Use of PHI Procedure

POLICY HISTORY:
Supersedes: 2/27/14
Original Implementation Date: 2/27/14
Date Reviewed: 3/13/19, 3/24/20
Date Revised: 2/27/14, 3/13/19, 3/20/24

APPROVAL:

W.A. McNulty by [Signature] 3.31.20

Policy Owner Date